

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION

IN RE:	§	
	§	CASE NO. 22-60004
DAVID MICHAEL MOBLEY	§	Chapter 11
<i>Debtor</i>	§	

**QUALITY PARTIES' RESPONSE IN OPPOSITION TO
DEBTOR'S MOTION TO DISMISS CASE**

[Relates to Dkt. 136]

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COME NOW, Quality Lease and Rental Holdings, LLC; Quality Lease Rental Service, LLC; Quality Lease Service, LLC; and Rocacea, LLC (collectively referred to as the "Quality Parties"), and file this Response in Opposition to Debtor's Motion to Dismiss Case (Dkt. 136), and would show this Court as follows:

1. Quality filed its Motion to Convert Case to Chapter 7 or, in the Alternative, to Appoint a Chapter 11 Trustee or Examiner (the "Quality Parties' Motion") on September 15, 2022 (Dkt. 137). The Quality Parties oppose the Debtor's Motion to Dismiss for all of the grounds set forth in the Quality Parties' Motion, which is incorporated herein by this reference.

Conclusion

For the reasons provided in the Quality Parties' Motion, the Court should not dismiss this case, but instead should convert this case to chapter 7 case. The Quality Parties request this and such other and further relief to which it may be entitled.

Respectfully submitted,

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Lease Service, LLC, and Rocacea,
LLC***

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing has been served by electronic means via ECF transmission to all PACER system participants in this bankruptcy case on October 10, 2022.

/s/ Walter J. Cicack

Walter J. Cicack